

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT WILLIAM BEATTIE

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 2252A(a)(2)(A),
2252A(a)(5)(B), 2252A(b)(1),
2252A(b)(2), and 2253(a)

COUNT ONE

Receipt and Distribution of Materials Containing Child Pornography

The Grand Jury Charges:

In or about April 2015 and continuing through August 6, 2015, in the District of North Dakota, and elsewhere,

ROBERT WILLIAM BEATTIE

knowingly received and distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT TWO

Possession of Materials Containing Child Pornography

The Grand Jury Further Charges:

On August 6, 2015, in the District of North Dakota, and elsewhere,

ROBERT WILLIAM BEATTIE

knowingly possessed material that contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor who had not attained 12 years of age, that had been transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, **ROBERT WILLIAM BEATTIE** knowingly possessed electronic files on a 4GB Dynet USB thumb drive, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT THREE

Possession of Materials Containing Child Pornography

The Grand Jury Further Charges:

On or about August 6, 2015, in the District of North Dakota,

ROBERT WILLIAM BEATTIE

knowingly possessed materials that contain an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor who had not attained 12 years of age, that had been transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, **ROBERT WILLIAM BEATTIE** knowingly possessed electronic files on a 1TB Seagate hard drive, SN: Z1DAZQSR, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction for violating Title 18, United States Code, Section 2252A, as charged in this Indictment,

ROBERT WILLIAM BEATTIE

shall forfeit to the United States, any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violation, including, but not limited to, the following:

- 4GB Dynet USB thumb drive seized on August 6, 2015, from William Beattie's office located at 501 North Columbia Road, Grand Forks, North Dakota
- Seagate hard drive, SN: Z1DAZQSR
- Amazon Fire phone, SN: 34331030025226

By virtue of the commission by defendant of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is

vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson _____
Foreperson

/s/ Christopher C. Myers _____
CHRISTOPHER C. MYERS
Acting United States Attorney

JKP:ta